

Reagan E. Bradford, OBA #22072*
Ryan K. Wilson, OBA #33306*
*admitted *pro hac vice*
BRADFORD & WILSON PLLC
431 W. Main Street, Suite D
Oklahoma City, OK 73102
(405) 698-2770
(405) 234-5506 fax
reagan@bradwil.com
ryan@bradwil.com

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF WYOMING**

Madeline A. Wright, on behalf of herself
and all others similarly situated,

Plaintiff,

v.

Devon Energy Production Company, L.P.,

Defendant.

Civil Action No. 22-CV-213-KHR-SPK

**CLASS REPRESENTATIVE’S
MOTION FOR APPROVAL OF FINAL PLAN OF ALLOCATION
AND ENTRY OF DISTRIBUTION ORDER**

Pursuant to the Settlement Agreement (Doc. 31-1) and the Initial Plan of Allocation Order (Doc. 45), Class Representative files this Motion for Approval of Final Plan of Allocation and Entry of Distribution Order.¹ In support of this Motion, Class Representative shows the Court the following:

1. On August 9, 2024, the Court entered several orders (collectively, the “Orders”) related to approval of the Settlement:

¹ All capitalized terms not otherwise defined in this Motion shall have the same meanings ascribed to them in the Settlement Agreement.

- a. the Order Granting Final Approval of Settlement (Doc. 43) (“Judgment”);
 - b. the Initial Plan of Allocation Order (Doc. 45); and
 - c. the Order Awarding Plaintiff’s Attorneys’ Fees, Litigation Expenses, Administration, Notice, and Distribution Costs, and Case Contribution Award (Doc. 44) (the “Fee and Expense Order”).
2. Under the Orders and the Settlement Agreement, Class Representative is required to file and seek approval of a final plan of allocation and entry of a distribution order to disburse the Net Settlement Fund to Class Members. This Motion seeks that approval.
3. Class Representative has calculated a Final Plan of Allocation that takes into account the Gross Settlement Fund (\$11 million), plus accrued interest while in the Escrow Account, and subtracts the amounts awarded in the Fee and Expense Order and the amounts attributable to the opt-outs approved by the Court in the Judgment.
4. The result is Class Representative’s proposed Final Plan of Allocation, which is attached to this Motion as **Exhibit 1**.
5. The proposed Final Plan of Allocation shows the proportionate settlement payments to be made to Class Members in accordance with the Allocation Methodology previously approved by the Court.
6. Upon the Court's approval, the distributions set out in the Final Plan of Allocation will be made to Class Members in accordance with the Orders and the Settlement Agreement. To effectuate distribution, the Settlement Administrator will transfer funds from the Escrow Account to a distribution account for further administration and distribution.
7. Class Representative respectfully requests that the Court enter the proposed Final Plan of Allocation and Distribution Order in the form attached as **Exhibit 2**. Class Representative will also submit a native version of the proposed order.

Respectfully Submitted,

/s/ Reagan E. Bradford

Reagan E. Bradford, OBA #22072*

Ryan K. Wilson, OBA #33306*

*admitted *pro hac vice*

BRADFORD & WILSON PLLC

431 W. Main Street, Suite D

Oklahoma City, OK 73102

(405) 698-2770

(405) 234-5506 fax

reagan@bradwil.com

ryan@bradwil.com

~~—and—~~

Rick Erb 6-2663

RICHARD A. ERB, JR., PC

PO Box 36

Gillette, WY 82717

(307) 682-0215

(307) 682-1339 fax

rick@rickerb.com

COUNSEL FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2025, a true and correct copy of the above and foregoing document was served in accordance with the Local Rules on all counsel of record via the Court's electronic filing system.

/s/ Reagan E. Bradford

Reagan E. Bradford